Case 1:19-cr-10081-IT Document 272-1 Filed 10/22/19 Page 1 of 12

Criminal Case Cover Sheet U.S. District Court	- District of Massachusetts		
Place of Offense: Category No. II Investigating Agenc	у ЕВІ		
City Boston Related Case Information:			
Superseding Ind./ Inf. X Case Same Defendant X New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of	ormation		
Defendant Information:			
Defendant Name Gordon Ernst Juvenile:	Yes ✓ No		
Is this person an attorney and/or a member of any state/federal bar: Alias Name	Yes 🗸 No		
Address (City & State) Chevy Chase, MD			
Birth date (Yr only): 1967 SSN (last4#): 6524 Sex M Race: White National	ality: USA		
Defense Counsel if known: Address			
Bar Number			
U.S. Attorney Information:			
AUSA Eric S. Rosen Bar Number if applicable NY	74412326		
Interpreter:			
Victims: ✓ Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2)	✓ Yes No		
Matter to be SEALED: Yes V No			
Warrant Requested	ody		
Location Status:			
Arrest Date			
Already in Federal Custody as of in Already in State Custody at Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: on			
Charging Document: ☐ Complaint ☐ Information ☐ Information	dictment		
Total # of Counts:	lony 8		
Continue on Page 2 for Entry of U.S.C. Citations			
I hereby certify that the case numbers of any prior proceedings before a Magistrate accurately set forth above.	e Judge are		
Date: 10/22/2019 Signature of AUSA:			

District Court Case Number (To be filled in by deputy clerk):

Name of Defendant Gordon Ernst

	•	U.S.C. Citations	•
	Index Key/Code	Description of Offense Charged	Count Numbers
Set 1	18 U.S.C. § 1962(d)	Racketeering Conspiracy	1
Set 2	18 U.S.C. § 1349	Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud	2
Set 3	18 U.S.C. § 371	Conspiracy to Commit Federal Programs Bribery	4
Set 4	18 U.S.C. § 666(a)(1)(B)	Federal Programs Bribery	6
Set 5	18 U.S.C. §§ 1343 & 1346, 2	Wire Fraud & Honest Services Wire Fraud; Aiding & Abetting	7, 10
Set 6	18 U.S.C. §§ 1341 & 1346, 2	Mail Fraud & Honest Services Mail Fraud; Aiding & A	19
Set 7	18 U.S.C. §§ 1957 and 2	Money Laundering; Aiding & Abetting	22
Set 8	18 U.S.C. § 981(a)(1)(C)	Forfeiture	
Set 9	28 U.S.C. § 2461(c)	Forfeiture	
Set 10	18 U.S.C. § 982(a)(1)	Money Laundering Forfeiture	
Set 11	18 U.S.C. § 1963(a)	Racketeering Forfeiture	
Set 12			
Set 13			
Set 14			
Set 15	-	· · · · · · · · · · · · · · · · · · ·	
ADDI	TIONAL INFORMATION:	18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK,	, 18-6238-MPK
18-623	5-MPK, 18-6476-MPK, 18-6477-M	IPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-M	PK
19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK			
18-722	7-MPK, 19-6029-MPK, 19-6030-M	PK	

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Place of Offense: Category No. II Investigating Agency FBI
City Boston Related Case Information:
County Middlesex Superseding Ind./ Inf. X Same Defendant X New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of
Defendant Information:
Defendant Name Donna Heinel Juvenile: Yes ✓ No
Is this person an attorney and/or a member of any state/federal bar: Yes ✓ No Alias Name
Address (City & State) Long Beach, CA
Birth date (Yr only): 1961 SSN (last4#): 8395 Sex W Race: White Nationality: USA
Defense Counsel if known: Address
Bar Number
U.S. Attorney Information:
AUSA Eric S. Rosen Bar Number if applicable NY4412326
Interpreter: Yes ✓ No List language and/or dialect:
Victims: ✓ Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ✓ Yes No
Matter to be SEALED:
Warrant Requested ✓ Regular Process ☐ In Custody
Location Status:
Arrest Date
Already in Federal Custody as of in
Already in State Custody at
On Pretrial Release: Ordered by: on
Charging Document: ☐ Complaint ☐ Information ✓ Indictment
Total # of Counts: ☐ Petty ☐ Misdemeanor ☐ ✓ Felony ☐ 10
Continue on Page 2 for Entry of U.S.C. Citations
 ✓ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above. Date: 10/22/2019 Signature of AUSA:

District Court Case Number (To be filled in by deputy clerk): 19-10081-IT

Name of Defendant

Donna Heinel

U.S.C. Citations			
	Index Key/Code	Description of Offense Charged	Count Numbers
Set 1	18 U.S.C. § 1962(d)	Racketeering Conspiracy	1
Set 2	18 U.S.C. § 1349	Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud	2
Set 3	18 U.S.C. § 371	Conspiracy to Commit Federal Programs Bribery	3
Set 4	18 U.S.C. §§ 1343 & 1346, 2	Wire Fraud & Honest Services Wire Fraud; Aiding & Abetting	11-16
Set 5	18 U.S.C. §§ 1341 & 1346, 2	Mail Fraud & Honest Services Mail Fraud; Aiding & Abetting	21
Set 6	18 U.S.C. § 981(a)(1)(C)	Forfeiture	
Set 7	28 U.S.C. § 2461(c)	Forfeiture	
Set 8	18 U.S.C. § 1963(a)	Racketeering Forfeiture	
Set 9			
Set 10			
Set 11			
Set 12			
Set 13	<u> </u>		
Set 14			
Set 15			
ADDITIONAL INFORMATION: 18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK, 18-6238-MPK			
18-6235-MPK, 18-6476-MPK, 18-6477-MPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-MPK			
19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK			
18-7227-MPK, 19-6029-MPK, 19-6030-MPK			

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Criminal Case Cover Sheet U.S. District Court - District of Massachusetts			
Place of Offense: Category No. II Investigating Agency FBI			
City Boston Related Case Information:			
County Middlesex Superseding Ind./ Inf. X Case No. 19-10081-IT Same Defendant X New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of Superseding Ind./ Inf. X Case No. 19-10081-IT New Defendant See additional information			
Defendant Information:			
Defendant Name			
Is this person an attorney and/or a member of any state/federal bar: Yes No Alias Name			
Address (City & State) Los Angeles, CA			
Birth date (Yr only): 1972 SSN (last4#): 9636 Sex M Race: White Nationality: USA			
Defense Counsel if known: Address			
Bar Number			
U.S. Attorney Information:			
AUSA Eric S. Rosen Bar Number if applicable NY4412326			
Interpreter:			
Victims: ✓ Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ✓ Yes No			
Matter to be SEALED: Yes V No			
Warrant Requested			
Location Status:			
Arrest Date			
Already in Federal Custody as of in Already in State Custody at Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: on			
Charging Document: ☐ Complaint ☐ Information ✓ Indictment			
Total # of Counts: ☐ Petty — ☐ Misdemeanor — ☐ Felony 5			
Continue on Page 2 for Entry of U.S.C. Citations			
 ✓ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above. Date: 10/22/2019 Signature of AUSA: 			

District Court Case Number (To be filled in by deputy clerk):

19-10081-IT

Name of Defendant

Jorge Salcedo

U.S.C. Citations			
	Index Key/Code	Description of Offense Charged	Count Numbers
Set 1	18 U.S.C. § 1962(d)	Racketeering Conspiracy	1
Set 2	18 U.S.C. § 1349	Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud	2
Set 3	18 U.S.C. § 371	Conspiracy to Commit Federal Programs Bribery	5
Set 4	18 U.S.C. §§ 1343 & 1346, 2	Wire Fraud & Honest Services Wire Fraud; Aiding & Abetting	17
Set 5	18 U.S.C. §§ 1341 &1346, 2	Mail Fraud & Honest Services Mail Fraud; Aiding & Abetting	20
Set 6	18 U.S.C. § 981(a)(1)(C)	Forfeiture	
Set 7	28 U.S.C. § 2461(c)	Forfeiture	
Set 8	18 U.S.C. § 1963(a)	Racketeering Forfeiture	
Set 9			· · · · · · · · · · · · · · · · · · ·
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			44/4
Set 15			
ADDITIONAL INFORMATION: 18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK, 18-6238-MPK			
18-6235-MPK, 18-6476-MPK, 18-6477-MPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-MPK			
19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK			
18-7227-MPK, 19-6029-MPK, 19-6030-MPK			

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Criminal Case Cover Sheet	U.S. District Court - District of Massachusetts		
Place of Offense: Category N	No. II Investigating Agency FBI		
City Boston Re	elated Case Information:		
Sai Ma Sea	perseding Ind./ Inf. X Case No. 19-10081-IT me Defendant X New Defendant agistrate Judge Case Number arch Warrant Case Number See additional information 20/R 40 from District of		
Defendant Information:			
Defendant Name Mikaela Sanford	Juvenile: Yes 🗸 No		
Is this person an attorney an Alias Name	d/or a member of any state/federal bar: Yes ✓ No		
Address (City & State) Folsom, CA			
Birth date (Yr only): 1986 SSN (last4#): 5201	Sex W Race: White Nationality: USA		
Defense Counsel if known:	Address		
Bar Number			
U.S. Attorney Information:			
AUSA Eric S. Rosen	Bar Number if applicable NY4412326		
Interpreter: Yes Vo	List language and/or dialect:		
Victims: ✓ Yes No If yes, are the	ere multiple crime victims under 18 USC§3771(d)(2) ✓ Yes No		
Matter to be SEALED: Yes	No		
Warrant Requested	Regular Process In Custody		
Location Status:			
Arrest Date			
Already in Federal Custody as of in Already in State Custody at Serving Sentence Awaiting Trial on			
Charging Document: Complaint	☐ Information ✓ Indictment		
Total # of Counts:	Misdemeanor Felony $\frac{3}{2}$		
Continue o	on Page 2 for Entry of U.S.C. Citations		
accurately set forth above.	s of any prior proceedings before a Magistrate Judge are ure of AUSA:		

19-10081-IT District Court Case Number (To be filled in by deputy clerk): Name of Defendant Mikaela Sanford **U.S.C.** Citations Index Key/Code **Description of Offense Charged Count Numbers** 18 U.S.C. § 1962(d) Set 1 Racketeering Conspiracy Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud 18 U.S.C. § 1349 Set 2 Wire Fraud & Honest Services Wire Fraud; Aiding & A Set 3 18 U.S.C. §§ 1343 & 1346, 2 Forfeiture 18 U.S.C. § 981(a)(1)(C) Set 4 Forfeiture 28 U.S.C. § 2461(c) Set 5 Racketeering Forfeiture 18 U.S.C. § 1963(a) Set 6 Set 7 Set 8 Set 9 Set 10 _____ Set 11 Set 12 _____ Set 13 _____ Set 14 _____ Set 15 _____ 18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK, 18-6238-MPK ADDITIONAL INFORMATION: 18-6235-MPK, 18-6476-MPK, 18-6477-MPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-MPK 19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK

18-7227-MPK, 19-6029-MPK, 19-6030-MPK

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Criminal Case Cover Sheet U.S. District Court - District of Massachusetts			
Place of Offense: Category No. II Investigating Agency FBI			
City Boston Related Case Information:			
County Middlesex Superseding Ind./ Inf. X Case No. 19-10081-IT Same Defendant X New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of See additional information			
Defendant Information:			
Defendant Name			
Is this person an attorney and/or a member of any state/federal bar: Yes No Alias Name			
Address (City & State) Rancho Palos Verdes, CA			
Birth date (Yr only): 1961 SSN (last4#): 4266 Sex M Race: White Nationality: USA			
Defense Counsel if known: Address			
Bar Number			
U.S. Attorney Information:			
AUSA Eric S. Rosen Bar Number if applicable NY4412326			
Interpreter:			
Victims: ✓ Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ✓ Yes No			
Matter to be SEALED:			
Warrant Requested ✓ Regular Process ☐ In Custody			
Location Status:			
Arrest Date			
Already in Federal Custody as of in Already in State Custody at Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: on			
Charging Document: ☐ Complaint ☐ Information ☐ Indictment			
Total # of Counts: ☐ Petty ☐ Misdemeanor ☐ Felony 3 ☐ Felony ☐ F			
Continue on Page 2 for Entry of U.S.C. Citations			
✓ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above. Date: 10/22/2019 Signature of AUSA:			

District Court Case Number (To be filled in by deputy clerk):

19-10081-IT

Name of Defendant

Jovan Vavic

U.S.C. Citations			
	Index Key/Code	Description of Offense Charged	Count Numbers
Set 1	18 U.S.C. § 1962(d)	Racketeering Conspiracy	1
Set 2	18 U.S.C. § 1349	Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud	2
Set 3	18 U.S.C. §§ 1343 & 1346, 2	Wire Fraud & Honest Services Wire Fraud; Aiding & Abetting	18
Set 4	18 U.S.C. § 981(a)(1)(C)	Forfeiture	
Set 5	28 U.S.C. § 2461(c)	Forfeiture	
Set 6	18 U.S.C. § 1963(a)	Racketeering Forfeiture	
Set 7			· · · · · · · · · · · · · · · · · · ·
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15		·	
ADDI	TIONAL INFORMATION:	18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK,	18-6238-MPK
18-6235-MPK, 18-6476-MPK, 18-6477-MPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-MPK			
19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK			
18-7227-MPK, 19-6029-MPK, 19-6030-MPK			
			 -

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Criminal Case Cover Sheet	U.S. District Court - District of Massachusetts		
Place of Offense: Ca	tegory No. II Investigating Agency FBI		
City Boston	Related Case Information:		
County Middlesex	Superseding Ind./ Inf. X Case No. 19-10081-IT Same Defendant X New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of		
Defendant Information:			
Defendant Name Niki Williams	Juvenile: Yes ✓ No		
Is this person an atte	orney and/or a member of any state/federal bar: Yes 🗸 No		
Address (City & State) Hou	uston, TX		
Birth date (Yr only): 1974 SSN (last4#):	7938 Sex W Race: Black Nationality: USA		
Defense Counsel if known:	Address		
Bar Number			
U.S. Attorney Information:			
AUSA Eric S. Rosen	Bar Number if applicable NY4412326		
Interpreter: Yes V No	List language and/or dialect:		
Victims: Yes No If y	res, are there multiple crime victims under 18 USC§3771(d)(2) Yes No		
Matter to be SEALED: Ye	s 🗸 No		
Warrant Requested	✓ Regular Process		
Location Status:			
Arrest Date			
Already in Federal Custody as of in Already in State Custody at Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: on			
Charging Document:	mplaint Information Indictment		
Total # of Counts:	ty — Misdemeanor — \checkmark Felony $\frac{3}{}$		
Continue on Page 2 for Entry of U.S.C. Citations			
accurately set forth above.	numbers of any prior proceedings before a Magistrate Judge are		
Date: 10/22/2019	Signature of AUSA:		

District Court Case Number (To be filled in by deputy clerk):

19-10081-IT

Name of Defendant

Niki Williams

Name of Defendant Niki Williams		
	U.S.C. Citations	
Index Key/Code	Description of Offense Charged	Count Numbers
Set 1 18 U.S.C. § 1962(d)	Racketeering Conspiracy	1
Set 2 18 U.S.C. § 1349	Conspiracy to Commit Mail & Wire Fraud & Honest Services Mail & Wire Fraud	2
Set 3 18 U.S.C. §§ 1343 & 1346, 2	Wire Fraud & Honest Services Wire Fraud; Aiding & Abetting	8
Set 4 18 U.S.C. § 981(a)(1)(C)	Forfeiture	
Set 5 28 U.S.C. § 2461(c)	Forfeiture	
Set 6 18 U.S.C. § 1963(a)	Racketeering Forfeiture	
Set 7	· · · · · · · · · · · · · · · · · · ·	
Set 8		
Set 9		
Set 10		
Set 11		
Set 12		
Set 13	· ·	
Set 14		
Set 15		
ADDITIONAL INFORMATION: 18-6218-MPK, 18-6237-MPK, 18-6236-MPK, 18-6234-MPK, 18-6238-MPK		
18-6235-MPK, 18-6476-MPK, 18-6477-MPK, 18-6475-MPK, 18-6478-MPK, 18-6261-MPK, 18-6260-MPK		
19-6003-MPK, 19-6005-MPK, 19-6004-MPK, 19-6006-MPK, 18-6240-MPK, 18-6310-MPK, 18-6474-MPK, 18-6474-MPK		
18-7227-MPK, 19-6029-MPK, 19-6030-MPK		
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